

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF RHODE ISLAND**

IN RE:

**Paul L. Spremulli
Kerstin Spremulli
Debtors**

**:
: Bk. No. 14-10205
: Chapter 7
:**

**MOTION OF THE CHAPTER 7 TRUSTEE TO EXTEND THE TIME FOR FILING
OBJECTION TO DISCHARGE PURSUANT TO 11 U.S.C. § 727**

Now comes Lisa A. Geremia, the duly appointed Chapter 7 Trustee, and pursuant to 28 U.S.C. § 586(a)(3), 11 U.S.C. § 307, and Fed. R. Bankr. P. 1017(e) and 4004(b) respectfully moves this Honorable Court to extend the deadline for filing a complaint objecting to the Debtors' discharge under 11 U.S.C. § 727 for *all* interested parties and creditors including the Office of the United States Trustee.

In support thereof, the Trustee avers as follows:

1. On February 3, 2014, Paul L. Spremulli and Kerstin Spremulli (the "Debtors") filed for relief pursuant to Chapter 7, and Lisa A. Geremia is the duly appointed Chapter 7 Trustee.
2. At the initial Meeting of Creditors held on February 27, 2014, the Trustee continued the Meeting of Creditors until March 12, 2014 for documents and additional testimony.
3. At the Meeting of Creditors on March 12, 2014, the Trustee requested additional documents and continued the Meeting of Creditors until April 24, 2014.
4. The Meeting of Creditors was adjourned on April 24, 2014.
5. The Discharge Deadline is May 29, 2014.
6. The Trustee wishes to extend the discharge deadline to file a Complaint to Determine Dischargeability for forty-five (45) days until she has completed her review.

WHEREFORE, the Trustee hereby requests this Court enter an order extending the time for filing a complaint objecting to the Debtors' discharge under 11 U.S.C. § 727 *for all* interested parties and creditors including the Office of the United States Trustee for forty-five (45) days

through and including, Monday, July 14, 2014.

Dated: May 29, 2014

/s/ Lisa A. Geremia
Lisa A. Geremia, Esquire [#5541]
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Within fourteen (14) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if served by mail, any party against whom such paper has been served, or any other party who objects to the relief sought, shall serve and file an objection or other appropriate response to said paper with the Bankruptcy Court Clerk's Office, 380 Westminster Street, 6th Floor, Providence, RI 02903, (401) 626-3100. If no objection or other response is timely filed, the paper will be deemed unopposed and will be granted unless: (1) the requested relief is forbidden by law; (2) the requested relief is against public policy; or (3) in the opinion of the Court, the interest of justice requires otherwise.

CERTIFICATION

I hereby certify that on May 29, 2014, I electronically filed the within Motion to Extend Discharge Deadline with the Clerk of the Bankruptcy Court for the District of Rhode Island using the CM/ECF System. The following participants have received notice electronically: The Office of the U.S. Trustee and Kevin D. Heitke, Esquire; and I hereby certify that I have mailed by United States Postal Service, via first class mail, the document and a copy of the Notice of Electronic Filing to Mr. Paul L. Spremulli and Mrs. Kerstin Spremulli, 1928 Victory Highway, Coventry, RI 02816 and to the parties listed on the attached Exhibit A.

/s/ Lisa A. Geremia